

July 9, 2012

SENT VIA ELECTRONIC MAIL – *LIHPTransitionProject@dhcs.ca.gov*

LIHP Transition Project
Department of Health Care Services
1501 Capitol Avenue, P.O. Box 997413
Sacramento, CA 95899-741

Re: DRAFT Initial Low Income Health Program (LIHP) Transition Plan

To Whom It May Concern:

The Orange County Health Authority, dba, CalOptima, submits the following comments on the Draft initial Low Income Health Program (LIHP) Transition Plan (Plan).

CalOptima has been serving the Medi-Cal beneficiaries of Orange County for the past 17 years as a County Organized Health System (COHS) and currently serves nearly 390,000 Medi-Cal beneficiaries. We look forward to welcoming new members through the expansion of the Medi-Cal program and for the opportunity to continue to deliver quality, cost-effective and compassionate care to this new segment of our community.

CalOptima commends the Department of Health Care Services (DHCS) for its commitment to effect a smooth transition of LIHP enrollees into Medi-Cal and avoid disruptions in care, as evidenced by its concern for the preservation of enrollees' existing medical home. CalOptima recognizes this Plan is a preliminary overview of the transition process and offers the following questions and recommendations to DHCS for consideration.

Continuity of Care

It is essential that the Medi-Cal Managed Care Plans (MMCP) receive any open authorizations as soon as possible from the local LIHPs to ensure uninterrupted care. Accordingly, CalOptima assumes that the LIHPs will receive instruction regarding the timely transfer of any open authorizations for medical care to the members' new plan.

CalOptima also hopes to receive a list of LIHP enrollees who have been receiving case management services so that our case managers can conduct outreach to new members upon enrollment and begin developing relationships that support the achievement of positive health outcomes.

Data Transmission

Timely and accurate transmission of enrollee data is also essential to help mitigate disruptions to care. In order to plan for the effective receipt and management of enrollee data, CalOptima requests detailed responses from DHCS to the following questions:

- In what format do the LIHPs currently transmit encounter data to the state? What fields are used to identify enrollees?
- Do LIHP aid codes correspond with existing codes in the Medi-Cal Eligibility Data System (MEDS)?
- Will the LIHP members be enrolled under CalOptima's current Medi-Cal plan ID, or will DHCS transmit a separate eligibility file for this new population?

Lastly, CalOptima suggests that DHCS' pre-eligibility instructions and forms include a request for authority to share enrollees' historical clinical and claims data with their new plan for purposes of care continuity.

Claims

CalOptima assumes that the LIHPs and the MMCPs will receive clear and consistent guidelines with regard to payment of claims for members in transition. As an example, it will be important to determine which entity will bear financial responsibility for members who are hospitalized on or around January 1, 2014.

Communication to Enrollees

As CalOptima is a COHS, LIHP enrollees in Orange County eligible for Medi-Cal will become members of our MMCP. CalOptima requests that DHCS work with COHS plans to develop enrollee notification materials that eliminate confusion regarding the enrollment and plan assignment process in COHS counties.

On behalf of CalOptima, thank you for the opportunity to comment on this Plan. We look forward to working with DHCS over the next several months to ensure that eligible LIHP enrollees are effectively enrolled in CalOptima's Medi-Cal program. If you have any questions or require additional information, please contact me at (714) 347-3237, or mengelhard@caloptima.org.

Sincerely,



Michael P. Engelhard
Interim Chief Executive Officer